

**REMARKS:**

**1. Summary of the Rejections in the Office Action of February 24 , 2005**

At paragraph 3, on page 2 of the Office Action, the Examiner withdraws the rejection of claims 1-6 under 35 U.S.C. § 102(e).

At paragraph 4, on page 2 of the Office Action, the Examiner indicates that an amendment to p. 5, line 28 of the specification has not been entered because the directions are unclear.

At paragraph 7, on page 3 of the Office Action, the Examiner rejects claims 1-20 and 22-25 under 35 U.S.C. § 103(a), as allegedly being unpatentable over U.S. Patent No. 6,253,204 to Glass *et al.* ("Glass") in view of U.S. Patent No. 6,061,697 to Nakao ("Nakao").

**2. Amendment to the Specification Not Entered**

At paragraph 4, on page 2 of the Office Action the Examiner indicates that an amendment to p. 5, line 28 of the specification, presented in the Amendment filed on December 7, 2000, has not been entered because the directions are unclear.

The Applicant requests that the amendment to page 5, line 28 of the specification not be entered.

**3. 35 U.S.C. § 103(a) Rejections**

At paragraph 7, on page 3 of the Office Action, the Examiner rejects claims 1-20 and 22-25 under 35 U.S.C. § 103(a), as allegedly being unpatentable over U.S. Patent No. 6,253,204 to Glass *et al.* ("Glass") in view of U.S. Patent No. 6,061,697 to Nakao ("Nakao").

The Applicant respectfully TRAVERSES the Examiner's rejection and asserts the following remarks in response:

In order for the Examiner to establish a prima facie case for obviousness, three (3) criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to those of ordinary skill in the art, to modify the primary reference as the Examiner proposes. Second, there must be a reasonable expectation of success in connection with the Examiner's proposed combination of the references. And third, the prior art references must disclose or suggest all of the claimed limitations. MPEP 2143 (Emphasis added.) The Applicant submits that the Examiner fails to satisfy his burden of establishing a prima facie case for obviousness because the Examiner fails to show sufficient suggestion or motivation to modify Glass by the teachings of Nakao as suggested in the outstanding Office Action. Applicant further submits that there is no reasonable expectation of success in connection with the Examiner's proposed combination of the references. Moreover, Applicant submits that the combination of Glass and Nakao fails to disclose or suggest all of the claimed limitations of claims 1-20 and 22-42.

a. **Independent Claims 1, 7, 13 and 22-25**

The Applicant's independent claim 1 describes a network client, which includes, among others, the limitations of "a replaceable document type definition component configured to control said parsing component based on a particular layout document type definition corresponding to said at least one particular grammar...said particular layout document type definition being replaceable during execution of said network client based on said at least one particular grammar, said particular layout

document type definition permitting said renderable content to be rendered” (emphasis added).

The Applicant’s independent claim 7 describes a method for manifesting content received via a network client, comprising, among others, the steps of “during execution of said network client, receiving a replaceable layout document type definition for said renderable content based on said at least one particular grammar; parsing said renderable content based on said replaceable document type definition to generate a well-formed content model...” (emphasis added).

The Applicant’s independent claim 13 describes a method of using a personal computing system equipped with a network client, comprising, among others, the limitations of “a replaceable document type definition component configured to control said parsing component based on a particular document type definition corresponding to said at least one particular grammar, said particular document type definition being replaceable during execution of said network client based on said at least one particular grammar...during execution of said network client, receiving said particular document type definition based on said at least one particular grammar; using said parsing component to parse said renderable content to transform said renderable content into well-formed objects based on said particular document type definition to generate a content model...” (emphasis added).

The Applicant’s independent claim 22 describes a network client, which includes, among others, the limitations of “a document type definition component configured to acquire a replaceable document type definition during execution of said network client based on said at least one particular grammar associated with said

renderable content, and to control said parsing component based on said acquired document type definition corresponding to said at least one particular grammar to transform said renderable content into well-formed objects to be processed by a content model based on said at least one particular grammar, wherein said acquired document type definition permits said renderable content to be rendered.

The Applicant's independent claim 23 describes a network client, which includes at least the features of "a replaceable document type definition component configured to control said parsing component based on a particular layout document type definition corresponding to said at least one particular grammar to transform said renderable content into well-formed objects to be processed by a content model based on said at least one particular grammar, wherein said particular layout document type definition is replaceable during runtime of said network client based on said at least one particular grammar, and said particular layout document type definition permits said renderable content to be rendered" (emphasis added). Further, in claim 23, the "at least one particular grammar is unknown to said network client prior to runtime of said network client" (emphasis added).

The Applicant's independent claim 24 describes a method for manifesting content received via a network client, comprising at least the steps of "accessing an input content stream via a network connection to receive renderable content from said input content stream, said input content stream representing at least a layout source document, said renderable content being associated with at least one particular grammar and containing at least one expression, wherein said at least one particular grammar is unknown to said network client prior to runtime of said network client; during runtime of

said network client, receiving a replaceable layout document type definition based on said at least one particular grammar; parsing said renderable content based on said replaceable document type definition to generate a well-formed content model...” (emphasis added).

The Applicant’s independent claim 25 describes a method of using a personal computing system equipped with a network client, comprising at least the steps of “executing a network client...said network client including a scanner component for accessing said network server system to receive an input content stream containing a layout source document and to extract renderable content from said layout source document, wherein said renderable content is associated with at least one particular grammar and said at least one particular grammar is unknown to said network client prior to execution of said network client, a parsing component coupled to said scanner component for parsing said renderable content, and a replaceable document type definition component configured to control said parsing component based on a particular document type definition corresponding to said at least one particular grammar, said particular document type definition being replaceable during runtime of said network client based on said at least one particular grammar, said renderable content containing both malformed and well-formed expressions...during said execution of said network client, receiving said particular document type definition based on said at least one particular grammar; causing said parsing component to parse said renderable content to transform said renderable content into well-formed objects based on said particular document type definition to generate a content model...” (emphasis added).

Thus, in independent claims 1, 7, 13 and 22-25, a document type definition corresponding to at least one particular grammar is acquired, received or replaced during execution of a network client based on the at least one particular grammar, the at least one particular grammar being associated with renderable content extracted from a layout source document received by the network client.

At paragraph 7, on page 4 of the outstanding Office Action, the Examiner admits that Glass fails to teach receiving a replaceable layout document type definition. The Examiner asserts that “Nakao teaches replacing of an original DTD with a partial or modified DTD by adding declarations to the original DTD.” Office Action, Page 4.

Nakao teaches adding declarations to the document type definition of a document as a means of allowing the document to be simultaneously edited by multiple users. The Applicant submits that adding declarations to a document type definition is not the same as replacing the document type definition. Moreover, the Applicant submits that adding declarations to a document type definition is not analogous to obtaining or providing a document type definition for renderable content of a particular grammar, based on the particular grammar of the renderable content, as in the claimed invention.

The Applicant submits that adding declarations to a DTD is not analogous to the feature of replacing or providing a particular document type definition based on at least one particular grammar associated with renderable content received by a network client, during execution of the network client, as set forth in claims 1, 7, 13 and 22. Therefore, the Applicant respectfully submits that neither Nakao nor Glass, nor the combination thereof, discloses or suggests at least the aforementioned feature of claims 1, 7, 13 and 22.

Moreover, the Applicant submits that adding declarations to a DTD is not analogous to being able to replace or provide a particular document type definition based on at least one particular grammar associated with renderable content received by a network client, during execution or runtime of the network client, when the particular grammar is unknown to the network client prior to the execution or runtime of the network client, as set forth in claims 23-25. Therefore, the Applicant respectfully submits that neither Nakao nor Glass, nor the combination thereof, discloses or suggests at least the aforementioned features of claims 23-25.

Therefore, the Applicant respectfully requests that the Examiner withdraw the obviousness rejection of independent claims 1, 7, 13 and 22-25, as amended, and allow the same to issue in a U.S. patent.

**b. Dependent Claims 2-6, 8-12 and 14-20**

Claims 2-6, 8-12 and 14-20 depend from allowable independent claims 1, 7 and 13, respectively. Therefore, the Applicant respectfully requests that the Examiner withdraw the obviousness rejection of claims 2-6, 8-12 and 14-20 and allow the same to issue in a U.S. patent at least for this reason.

**c. New Claims 26-42**

New claims 26-42 recite features of the present invention that are neither disclosed nor suggested by the cited art of record. Thus, early and favorable action on new claims 26-42 is respectfully requested.

**CONCLUSION:**

The Applicant respectfully submits that the above-titled patent application is in condition for allowance, and such action is earnestly requested. If the Examiner believes that an in-person or telephonic interview with the Applicant's representatives will in any way expedite the examination of the above-titled patent application, the Examiner is invited to contact the undersigned attorney of record. The Applicant respectfully requests that the U.S. Patent and Trademark Office charge all fees in the above-titled patent application to the undersigned's Deposit Account No: 01-2300.

Respectfully submitted,

Arent Fox PLLC

By: 

Erik B. Cherdak  
Registration No. 39,936

Date: 8/19/05

Arent Fox PLLC  
1050 Connecticut Ave., N.W.  
Suite 400  
Washington, D.C. 20036-5339  
Telephone No. (202) 857-8933  
Facsimile No. (202) 857-6395

EBC/MLC:sg